



October 14, 2022

WA State Building Code Council Chair Anthony Doan
PO Box 41449
Olympia, WA 98504-1449

RE: Washington's residential energy code proposals

Dear Chair Doan and Members of the State Building Code Council:

We, members of the *America is All In* coalition and citizens of Washington state's broader community, urge you to adopt the full package of proposed residential building code updates put forth for public comment. We strongly support the requirements for heat pump systems in new homes and stricter ventilation for new homes with gas stoves.

Sustainable Buildings for a Zero-Emissions Future

Buildings represent approximately one quarter of Washington's greenhouse gas emissions, and the state has targets to significantly reduce this climate pollution. To achieve these ambitious climate targets and protect residents, we must build all-electric homes by installing measures such as heat pumps for water and space heating, restricting gas in new Washington residences, and raising efficiency standards. The proposals submitted will strongly incentivize all-electric construction and are critical to ensure the residential energy code delivers the state's goal of zero carbon new buildings by 2031.

The residential energy code proposals include:

- Requiring **heat pump systems** in new homes for space and water heating and encouraging them for 'cold' jurisdictions within Washington state.
- Improving energy efficiency by reducing the allowable air leakage rate and increasing energy efficiency requirements for new homes
- Increasing the ventilation requirements for gas stoves to reduce the impacts of NOx.

Impacts and benefits

Health

- Building all-electric homes will reduce indoor and outdoor air pollution and the associated health risks caused by fossil fuels and unhealthy air quality.

Equity

- Building all-electric homes with air conditioning will protect vulnerable populations from extreme heat. By installing electric heat pumps, we are automatically providing efficient heating and cooling.
- Studies have shown that eliminating gas in new homes will reduce both home construction costs and consumer expenses over time, enhancing more affordable homes and ensuring that Washington achieves both its climate and housing goals.
- Eliminating polluting methane gas from our homes is a crucial part of eliminating environmental and health disparities among communities of color and low-income households.

Safety

- New homes will be made safer by not connecting them to gas lines, which can leak and explode. A recent study in Environmental Science and Technology found that the rate of gas leaks in a city was higher in areas with majority people of color and in lower-income areas.

Market

- A robust energy code will help spur innovation even further and ensure that manufacturers are meeting the challenges the market demands to build high-performance all-electric homes.

From an economic, equity, and sustainability perspective, it makes sense to build efficient, electric homes. All Washington residents should be able to live in safe, healthy, affordable homes in sustainable and resilient communities. Thank you for your efforts to advance a building energy code that creates a healthy and sustainable future for all.

Sincerely,



Maria Miller, Owner
Natural Moxy



Sarah Sutton, CEO
Environment and Cultural Partners



Nora Nickum, Senior Ocean Policy
Seattle Aquarium



Clay Thompson, Manager
Creative Creek, LLC



Chris Overholt, President
Namu Baru Inc.



Katherine Radeka, Founder & CEO
Rapid Learning Cycles Institute



Shannon Ellis-Brock, CEO & President
PSSCU (Puget Sound Cooperative Credit Union)

Sarah Severn, Principal
Sarah Severn Consulting

